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PETER OPPENEER
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

MICHAEL EALES,

Case No.

18 U.S.C. § 2251(a)
18 U.S.C. § 2253

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about March 30, 2013, in the Western District of Wisconsin, the defendant

MICHAEL EALES,

knowingly used and coerced a known minor, Y.O.B. 2011, to engage in sexually explicit conduct for the purpose of transmitting a live visual depiction of such conduct, and the visual depiction was transmitted in and affecting interstate commerce.

(In violation of Title 18, United States Code, Section 2251(a))

COUNT 2

On or about April 13, 2013, in the Western District of Wisconsin, the defendant

MICHAEL EALES,

knowingly used and coerced a known minor, Y.O.B. 2011, to engage in sexually explicit conduct for the purpose of transmitting a live visual depiction of such conduct, and the

visual depiction was transmitted in and affecting interstate commerce.

(In violation of Title 18, United States Code, Section 2251(a))

COUNT 3

On or about April 24, 2013, in the Western District of Wisconsin, the defendant

MICHAEL EALES,

knowingly used and coerced a known minor, Y.O.B. 2011, to engage in sexually explicit conduct for the purpose of transmitting a live visual depiction of such conduct, and the visual depiction was transmitted in and affecting interstate commerce.

COUNT 4

On or about May 2, 2013, in the Western District of Wisconsin, the defendant

MICHAEL EALES,

knowingly used and coerced a known minor, Y.O.B. 2011, to engage in sexually explicit conduct for the purpose of transmitting a live visual depiction of such conduct, and the visual depiction was transmitted in and affecting interstate commerce.

(In violation of Title 18, United States Code, Section 2251(a))

FORFEITURE ALLEGATION

As a result of the offenses charged in Counts 1-4 of this indictment, and upon conviction for violating Title 18, United States Code, Section 2251(a), the defendant,

MICHAEL EALES,

shall forfeit to the United States, pursuant to United States Code, Section 2253, his right title, and interest in:

- (1) Toshiba laptop, serial number YB219666W;
- (2) Toshiba hard drive, serial number Y23TC2LIT SU4 EC.A
- (3) SanDisk SD card, 4gb

A TRUE BILL



PRESIDING JUROR



John W. Vaudreuil
JOHN W. VAUDREUIL
United States Attorney

Indictment returned: 6/27/2013